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March 22, 2005

Arizona Corporation Commission 1200 W Washington St Phoenix, AZ 85007

RE: Docket # E-01345A-03-0437 **Low Income Customers**

Dear Commissioners:

We commend the intent to insulate low-income customers from the effects of the rate increase contained in the settlement of the Arizona Public Service (APS) rate case. However, we believe the language describing low-income programs to be insufficiently precise.

The increase in funding for marketing E-3 and E-4 tariffs to \$150,000 is laudable, but completely lacks any mechanism for setting goals, determining whether it is successful, and making corrections if it falls short. We believe that APS should be directed to achieve automatic enrollment in low-income programs within a specific period of time, preferably nine to twelve months. APS should be required to report back to the Commission on the results, and allowed to make adjustments, with Commission approval, to improve the outcome.

We would point out that the discussion of automated sign-up (recommended order, page 24, line 6) for low-income families is not the same as automatic sign-up.

We urge the Commission to require APS to adopt clear goals for low-income programs, and to establish reasonable, specific time periods to achieve them, while providing the means for adjustments, should they be necessary.

Sincerely yours,

Lupe Solis

Associate State Director

Lupe Salie

cc: Jon Poston

Coralette Hannon

Arizona Corporation Commission DOCKETED

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